

Message

---

**From:** Yu-Lien Chu [Yu-Lien.Chu@erg.com]  
**Sent:** 12/15/2015 10:57:04 PM  
**To:** BECKHAM, LISA [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=75a0012699094cf59508bb04e90b393c-LBECKHAM]  
**CC:** Tennille B. Begay [tbbegay@navajo-nsn.gov]; Raju Bisht [rbisht@navajo-nsn.gov]; Tracy Curtis [Tracy.Curtis@erg.com]  
**Subject:** Re: Question - Opacity Limit for NGS

Hi Lisa,

Thanks for the updates. We are hoping to send the proposed permit to EPA before the holidays. Thank you for your help on this.

**Yu-Lien Chu**  
*Eastern Research Group (ERG), Inc.*  
TEL: (608) 695-2534  
E-Mail: [yu-lien.chu@erg.com](mailto:yu-lien.chu@erg.com)

---

**From:** BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>  
**Sent:** Tuesday, December 15, 2015 10:16 AM  
**To:** Yu-Lien Chu  
**Subject:** RE: Question - Opacity Limit for NGS

Hi Yu-Lien,

We are still reviewing it here – we just happened to be very busy at this time of year. I'll give you a call on Friday to update you.

---

**From:** Yu-Lien Chu [mailto:Yu-Lien.Chu@erg.com]  
**Sent:** Tuesday, December 15, 2015 5:33 AM  
**To:** BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>  
**Cc:** Tennille B. Begay <tbbegay@navajo-nsn.gov>; Raju Bisht <rbisht@navajo-nsn.gov>; Tracy Curtis <Tracy.Curtis@erg.com>  
**Subject:** Re: Question - Opacity Limit for NGS

Hi Lisa,

Do you have any update on this? Does EPA has any suggestion on how to respond this compliance comment for NGS? Thank you.

Yu-Lien

**Yu-Lien Chu**  
*Eastern Research Group (ERG), Inc.*  
TEL: (608) 695-2534  
E-Mail: [yu-lien.chu@erg.com](mailto:yu-lien.chu@erg.com)

---

**From:** Yu-Lien Chu  
**Sent:** Sunday, November 22, 2015 8:38 PM  
**To:** [beckham.lisa@epa.gov](mailto:beckham.lisa@epa.gov)  
**Cc:** Tennille B. Begay; Raju Bisht  
**Subject:** Question - Opacity Limit for NGS

Hi Lisa,

I'm the contractor for NNEPA for Navajo Generation Station's (NGS) Title V permit. We received several public comments from an environmental group on the draft Title V permit regarding to their opacity limit. Both NNEPA and I think we need EPA's help to resolve this issue. A copy of the comment is attached for your reference.

The commenter asked NGS to show compliance with the 20% opacity limit and to show how they exclude the condensed uncombined water droplets from the COMS readings. NGS stated that their stack exhausts have high moisture content (controlled by scrubbers & wet stack) and the COMS couldn't exclude water droplets from the readings. Therefore, it is not possible to show compliance with this 20% opacity limit using their COMS.

The current opacity condition in their FIP (40 CFR 49.5513(d)(4)) is listed below for your reference:

"*Opacity.* No owner or operator shall discharge or cause the discharge of emissions from the stacks of Units 1, 2, or 3 into the atmosphere exhibiting greater than 20% opacity, excluding condensed uncombined water droplets, averaged over any six (6) minute period and 40% opacity, averaged over six (6) minutes, during absorber upset transition periods"

We think this is a compliance demonstration issue and would like to talk to the compliance person at EPA for NGS. Is there a compliance person at EPA that we should contact with? If possible, we would like to have a conference call with you and the compliance staff to discuss this issue further. Thank you very much for your assistance on this.

**Yu-Lien Chu**  
*Eastern Research Group (ERG), Inc.*  
TEL: (608) 695-2534  
E-Mail: [yu-lien.chu@erg.com](mailto:yu-lien.chu@erg.com)